

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION

MDL No. 2:18-mn-2873-RMG

**This Document Relates to  
ALL CASES**

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**JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT A PROPOSED CMO  
REGARDING TIER 2 PERSONAL INJURY BELLWETHER PROCEEDINGS**

Pursuant to Local Civ. Rule 6.01 (D.S.C.), Co-Lead Counsel for Plaintiffs and Defendants respectfully move this Court for a brief extension of time to submit a proposed Case Management Order regarding Tier 2 Personal Injury Bellwether proceedings. This Motion is based on the following grounds:

1. Pursuant to CMO 26.C. (Dkt. 4276), the parties are to submit a proposed Case Management Order regarding Tier 2 Personal Injury Bellwether proceedings by no later than eight (8) weeks prior to the end of the Tier 1 Discovery period. The current deadline for the proposed Case Management Order is April 9, 2024.

2. This deadline has not been previously extended.

3. The parties jointly request an extension of time to allow them to attempt to reach agreement on a proposed Case Management Order regarding Tier 2 Personal Injury Bellwether proceedings.

4. The parties request an extension of fifteen (15) days to submit a proposed Case Management Order. With this requested extension, the deadline for the proposed Case Management Order would be extended to April 24, 2024.

5. This extension will not affect any existing deadlines.

WHEREFORE, Co-Lead Counsel for Plaintiffs and Defendants respectfully request that the Court extend the time for the parties to submit a proposed Case Management Order regarding Tier 2 Personal Injury Bellwether proceedings to April 24, 2024.

Dated: April 9, 2024

Respectfully submitted,

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